

# START

United States  
Environmental Protection  
Agency

Region 10  
Hanford Project Office  
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Richland WA 99352

0029374  
9305544



March 23, 1993



Eric D. Goller  
U.S. Department of Energy  
P.O. Box 550, A5-15  
Richland, Washington 99352

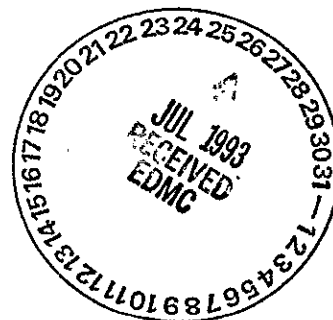
Subject: Transmittal of Vadose Sample Data Collected During  
Drilling for the 100-FR-3 Operable Unit

Dear Mr. Goller:

The intent of this letter is to inform the U.S. Department of Energy (DOE) that it has missed the scheduled date for transmittal of the vadose sample data resulting from drilling of the 100-FR-3 operable unit wells. The U.S. Environmental Protection Agency (EPA) requires transmittal of this data within 10 days of receipt of this letter as per the Hanford Federal Facility Agreement and Consent Order (TPA), Section 9.6.1, Paragraph 2.

The schedule for the 100-FR-3 operable unit is detailed in Figure 6-1 of "Remedial Investigation/ Feasibility Study Work Plan for the 100-FR-3 Operable Unit Hanford Site, Richland, Washington" (DOE/RL-91-53, Revision 0). It should be noted that the schedule for 100-FR-3 is different than that of 100-BC-5. The schedule shows that groundwater/soil sampling occurs concurrently with well installation. The laboratory analysis period for these samples is footnoted as "Validated Data will be transmitted 141 days after samples are taken, 105 days for analysis, 21 days for validation, and 15 days for transmittal" (See Enclosure 1). This requirement is also noted on the 100-KR-4 schedule. A letter from Larry Gadbois dated January 19, 1993 clarified this issue and requested a similar transmittal of data (See Enclosure 2).

Validated chemical and radiological data from sampling that occurred between August 19 and October 1, 1992 is being requested by this letter, including a description of the sample origin and the data qualifiers. This data should have been transmitted to the regulators by February 23, 1993. Thus the data requested is



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overdue. DOE is reminded of its commitment under the TPA Section 9.6, Paragraph 2, to put this data in HEIS (Hanford Environmental Information System) or other data bases available to the regulators within fifteen days from validation.

Please contact me at (509)376-4919 if you have any questions.

Sincerely,

*Pamela S. Innis*

Pamela S. Innis

100-FR-3 Operable Unit Manager

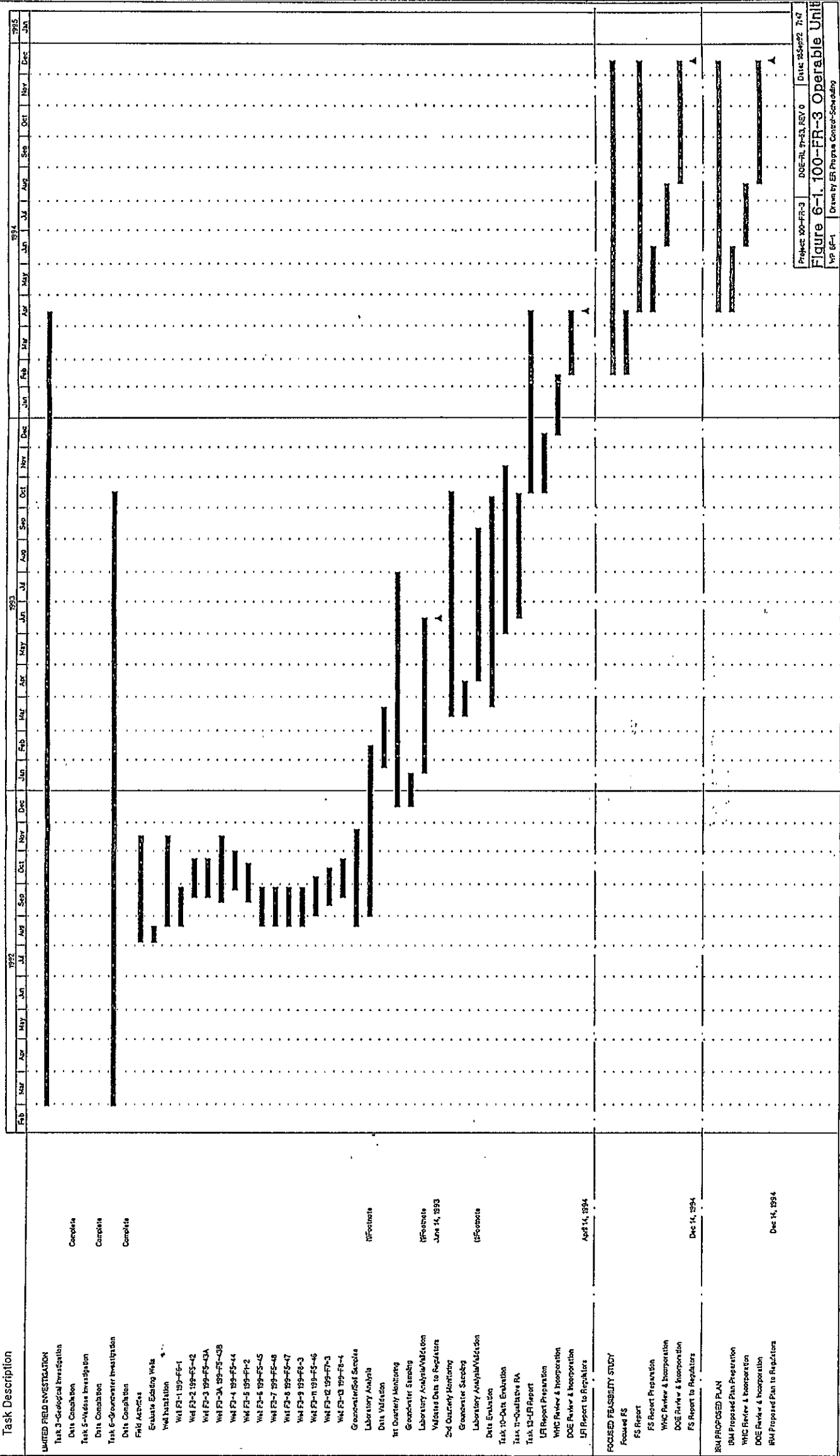
Enc: 1) 100-FR-3 Operable Unit Schedule, Figure 6-1.  
2) Letter from Laurence E. Gadbois to Eric Goller dated January 19, 1993.

cc: Julie Erickson, DOE  
Steve Wisness  
June Hennig, DOE  
Jack Donnelly, Ecology  
Dave Jansen/Roger Stanley  
Becky Austin, WHC  
Bob Henckel, WHC  
Administrative Record, 100-FR-3 Operable Unit



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100-FR-3 OPERABLE UNIT



Project: 100-FR-3 DOE-RL 97-53, REV 0 Date: 05/09/92 7:47  
Figure 6-1. 100-FR-3 Operable Unit  
V06 06-1 Drawn by: ERI Program Control-Scheduling



January 19, 1993

Eric D. Goller  
U.S. Department of Energy  
100 Area Unit Manager  
P.O. Box 550, A5-15  
Richland, Washington 99352

Subject: Transmittal of Vadose Sample Data Collected During  
Drilling For the 100-KR-4 Operable Unit. Missed  
Schedule.

Dear Mr. Goller:

This letter informs the U.S. Department of Energy (DOE) that it has missed the scheduled date for transmittal of the vadose sample data resulting from drilling of the 100-KR-4 operable unit wells. The U.S. Environmental Protection Agency (EPA) requires transmittal of this data within 10 days of receipt of this letter as per the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) section 9.6.1, paragraph 2.

The schedule for the 100-KR-4 operable unit is detailed in figure 6-1 of "Remedial Investigation/ Feasibility Study Work Plan for the 100-KR-4 Operable Unit, Hanford Site, Richland, Washington". The schedule shows that concurrent with well installation is groundwater/soil sampling (activity 6b-3 in the work plan). The laboratory analysis period for these samples is footnoted as "Validated Data will be transmitted 141 days after samples are taken, 105 days for analysis, 21 days for validation, and 15 days for transmittal" (see enclosure 1).

The first quarterly monitoring is another event detailed on the schedule. The quarterly monitoring has a laboratory analysis/validation period associated with it, plus a "validated data to regulators" event to which a milestone was attached. (Note that the milestone date was set about 141 days after the completion of the first quarterly monitoring; i.e. October 15, 1992 plus 141 days is about March 12, 1993.) As the schedule shows, the data resulting from the field drilling is to be transmitted 141 days after the samples are taken, and that this is independent from the March 12 milestone date for transmittal of the first quarterly monitoring data. To avoid confusion it should be noted that the 100-KR-4 schedule is different from that established for the 100-BC-5 work plan in which the vadose data and the first quarterly monitoring data are included in a single data package.

It should be noted that this request for data was made informally (via computer electronic mail) to DOE on January 5, 1992, to which Westinghouse Hanford replied it was not required to transmit the data until March 12, 1993 (see enclosure 2). DOE is reminded that the entire work plan is an enforceable

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Eric D. Goller

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January 19, 1993

document, and that this applies to all aspects of the work plan -  
- whether they have a specific milestone attached to them or not.

The validated data being requested by this letter is both chemical and radiological results, a description of the sample's origin, and all qualifications on the data resulting from the sampling that occurred between May 11, 1992 and August 6, 1992. All of this data should have been transmitted to the regulators by December 25, 1992. Thus all the data requested is overdue. DOE is also reminded of its commitment under the Tri-Party Agreement section 9.6, paragraph 2, to put this data in HEIS (Hanford Environmental Information System) or other data bases available to the regulators within fifteen days from validation. After we review this data, we may request validated data packages for selected samples.

Please contact me for specifics on the data deliverable format or if you have any other questions regarding this request. I may be contacted at (509) 376-9884. Again, I will be expecting this information within 10 days from receipt of this letter.

Sincerely,

*Laurence E. Gadbois*

Laurence E. Gadbois  
100-KR-4 Operable Unit Manager

Encl: (1) 100-KR-4 Operable Unit Schedule. Figure 6-1 in  
the work plan, DOE/RL-90-21, Revision 0.  
(2) Computer electronic mail correspondences.

cc: Julie Erickson, DOE  
Roger Freeberg, DOE  
June Hennig, DOE  
Steven Wisness, DOE  
Dib Goswami, Ecology  
Dave Jansen, Ecology  
Becky Austin, WHC  
Dick Fox, WHC  
Jim Roberts, WHC  
Administrative Record, 100-KR-4 Operable Unit

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# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
Pamela S. Innis, EPA	E. D. Goller, RL	Incoming: 9305544

Subject: Transmittal of Vadose Sample Data Collected During Drilling for the  
100-FR-3 Operable Unit

## INTERNAL DISTRIBUTION

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		G. W. Jackson	H6-21	
		L. G. Juguilon	H6-27	X
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		H. E. McGuire (Level 1)	B3-63	
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		R. D. Wojtasek (assignee)	H6-27	X
		EDMC	H6-08	X



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